

1 CHARLES H. JUNG (SBN 217909)
2 MICHAEL P. DILLINGHAM (SBN 244086)
NASSIRI & JUNG LLP
251 Kearny Street, Suite 501
3 San Francisco, CA 94108
Telephone: (415) 373-5699
4 Facsimile: (415) 534-3200
cjung@nassiri-jung.com

5 Attorneys for Defendant
6 XIAOBING SUN

7

8

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN JOSE DIVISION

12 SHORELINE CAPITAL MANAGEMENT,
LTD., a British Virgin Islands Company
13 limited by shares,

14 Plaintiff,

15 vs.

16 XIAOBING SUN, an individual,

17 Defendant.

18 Case No. 5:08-cv-00121-JW

19 PARTIES' STIPULATION TO
ENLARGE TIME FOR DEFENDANT
TO RESPOND TO THE COMPLAINT

20 WHEREAS Defendant Xiaobing Sun's ("Mr. Sun") response to Plaintiff Shoreline
21 Capital Management Ltd.'s ("Shoreline") Complaint in the above captioned case is due
22 Monday, January 28, 2008;

23 WHEREAS the Court is considering Mr. Sun's request to dismiss this case in its entirety
24 due to lack of subject matter jurisdiction;

25 WHEREAS the parties are required today and this week to exchange documents and
26 evidence regarding the Court's subject matter jurisdiction, and to prepare and file memoranda
27 regarding the same;

1 WHEREAS Shoreline has agreed to extend Mr. Sun's time in which to answer or
2 otherwise respond to the Complaint until 15 days after the Court issues a ruling on whether it
3 has subject matter jurisdiction;

4 NOW THEREFORE IT IS STIPULATED AND AGREED THAT:

5 1. Mr. Sun's time in which to respond to Shoreline's Complaint shall be extended
6 until 15 days after the Court has issued a ruling regarding the Court's subject matter jurisdiction.

7
8 DATED: January 28, 2008

NASSIRI & JUNG LLP

9 By: _____
10
11 
CHARLES H. JUNG

12 Attorneys for Defendant
13 XIAOBING SUN

14 DATED: January 28, 2008

15 COMMINS & WEBSTER, P.C.
16
17 By: _____
DAVID H. S. COMMINS

18 Attorneys for Plaintiff
19 SHORELINE CAPITAL MANAGEMENT, LTD.
20
21
22
23
24
25
26
27
28

1 WHEREAS Shoreline has agreed to extend Mr. Sun's time in which to answer or
2 otherwise respond to the Complaint until 15 days after the Court issues a ruling on whether it
3 has subject matter jurisdiction:

4 NOW THEREFORE IT IS STIPULATED AND AGREED THAT:

5 1. Mr. Sun's time in which to respond to Shoreline's Complaint shall be extended
6 until 15 days after the Court has issued a ruling regarding the Court's subject matter jurisdiction.

7

8 DATED: January 28, 2008

NASSIRI & JUNG LLP

9

10 By: _____ CHARLES H. JUNG

11

12 Attorneys for Defendant
13 XIAOBING SUN

14

DATED: January 28, 2008

15 COMMINS & WEBSTER, P.C.

16

17 By: 
DAVID H. S. COMMINS

18

19 Attorneys for Plaintiff
20 SHORELINE CAPITAL MANAGEMENT, LTD.

21

22

23

24

25

26

27

28